

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON, AT SEATTLE

SHAWLEE GEIGER,

Plaintiff,

vs.

UNITED STATES POSTAL SERVICE;
475 L'Enfant Plaza Southwest
Suite 2P600
Washington, DC 20260,

MEGAN BRENNAN, ADMINISTRATOR;
in her official capacity
475 L'Enfant Plaza Southwest
Suite 2P600
Washington, DC 20260,

and

UNITED STATES OF AMERICA,

Defendants.

Case No. 2:19-cv-1188

COMPLAINT FOR DAMAGES

PLAINTIFF'S COMPLAINT FOR DAMAGES

1 **1. PARTIES, JURISDICTION, VENUE & APPLICABLE LAW**

2 1.0 This case arises under this Federal Tort Claims Act (FTCA), Title 28, U.S.C.
3 §§ 2671-2680. Plaintiff has filed an administrative claim against the United States Postal
4 Service and the statutory time period has expired without settlement of the administrative
5 claim, accordingly this case is appropriate for litigation before this court.

6 1.1 SHAWLEE GEIGER resides within the Western District of Washington.

7 1.2 Defendant United States of America, and its agency the United States Postal
8 Service maintains an office and does business within the Western District of Washington.

9 1.3 The motor vehicle accident giving rise to this litigation occurred within the
10 Western District of Washington, City of Seattle, King County Washington.

11 1.4 Jurisdiction and Venue are appropriate in the United States District Court for
12 the Western District of Washington, at Seattle.

13 **2. STATEMENT OF FACTS COMMON TO PLAINTIFF'S CLAIMS**
14 **AND ALLEGATIONS OF NEGLIGENCE**

15 2.0 On or about October 26, 2016, Plaintiff, Shaylee Geiger, was operating her
16 motor vehicle in a safe and reasonable manner, to wit; approaching a stop sign located in
17 her lane of travel. As Plaintiff approached the stop sign in her lane of travel Defendant
18 operated a United States Postal Office in a negligent fashion crossing her lane of travel
19 striking her vehicle causing both bodily injury and property damage. Plaintiff was in no
20 manner negligent.
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28 PLAINTIFF'S COMPLAINT FOR DAMAGES

3.1 Defendants agent, an employee of the United States Postal Service, negligently operated a United States Postal truck in a negligent, unsafe, and grossly negligent manner: to wit; making an unsafe turn which caused the United States Postal truck to strike the front of Plaintiff's vehicle as she approached a stop sign within her lane of travel. Defendants agent's negligence of the United States Postal truck was the sole negligent act causing injury to plaintiff.

4.1 The acts, omissions, negligence, gross negligence, negligence *per se*, are the sole and proximate cause of plaintiff's injuries and resulting damages.

5.1 Plaintiff reserves the right to Amend this Complaint to add additional parties or claims as may be supported by facts learned through discovery.

WHEREFORE Plaintiff Prays for the following relief:

- A. General and special damages in an amount established at the time of trial.
- B. Pain and suffering damages, past, present and future, both physical and emotional in an amount established at the time of trial.
- C. Special damages for medicine, X-rays, cost of medical treatment and doctors and medical related costs of any nature, past, present and future.

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1 D. Loss of wages, past, present and future, in an amount established at the time of
2 trial.

3 E. Property damage.

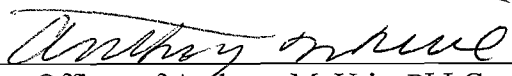
4 F. Loss of enjoyment of life in an amount to be proven at the time of trial.

5 G. For costs of suit, reasonable attorney fees.

6 H. For punitive damages in an amount within the jurisdiction of this court for
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8 defendant's gross negligence and or wanton, willful and careless disregard for
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10 human life and safety of others.

11 Dated this 30th day of July, 2019.

12 By:

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16 Law Offices of Anthony M. Urie, PLLC
17 ANTHONY M. URIE, WSBA#11711
18 Attorney for Plaintiff
19 Shawlee Geiger
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 PLAINTIFF'S COMPLAINT FOR DAMAGES